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November 2, 2022

VIA ECF

Honorable J. Paul Oetken
United States District Court
Southern District of New York
40 Foley Square, Room 2101
New York, New York 10007

Re: *Almonte v. JAM Maintenance, LLC et al.*,
No. 22 Civ. 1820 (JPO)(BCM) (Second Extension)

Dear Judge Oetken:

We represent the Plaintiffs in the above-referenced matter against Defendants 1165 Gerard Realty LLC, 1170 Gerard Realty LLC, Beauty Realty LLC, Sagamore Realty LLC, Prospect 2000 Realty LLC, Robert Kaszovitz, and Akiva Kaszovitz (collectively, the “Requesting Defendants”) and JAM Maintenance LLC and Diego Ramirez. We submit this letter in response to the Requesting Defendants’ letter filed today (ECF No. 42).

Plaintiffs refer to their letter-motion to the Court dated August 29, 2022 (ECF No. 33), for a recitation of the history of this case. Although Plaintiffs proposed consenting to the Requesting Defendants’ request for an extension in exchange for waiver of service of process and jurisdictional issues, ECF No. 42, the undersigned also reminded Mr. Binson that he has had the Complaint since at least mid-August 2022 and that Mr. Binson refused to accept service or provide his clients’ addresses for service of process purposes, causing Plaintiffs to have to chase down the Kaszovitz with a process server and incur unnecessary expenses. The Requesting Defendants have had over two months to submit an Answer. Unless there is a very good reason for the Requesting Defendants to have another extension, Plaintiffs object to the Requesting Defendants’ request.

We thank the Court for its time and attention to this matter and are available to discuss any further issues with the Court if necessary.

Respectfully submitted,

/s/ Gianfranco J. Cuadra

Gianfranco J. Cuadra

cc: Defense Counsel (via ECF)